

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

IN RE: )  
 )  
ALEX MEHRABI ) Case No. 15-11395-RGM  
 ) Chapter 13  
\_\_\_\_\_  
**Debtor** )  
 )  
Alex Mehrabi )  
 )  
**Plaintiff** )  
 )  
v. ) Adv. Pro. No. 15-01097-RGM  
 )  
Chicago Title Insurance Company, et al. )  
 )  
**Defendants** )

**AMENDED**  
**MOTION TO DISMISS WELLS FARGO BANK, N.A.**

Wells Fargo Bank, N.A. (“Wells Fargo”), by counsel, hereby files its Amended Motion to Dismiss Debtor/Plaintiff, Alex Mehrabi’s Complaint as to Wells Fargo Bank, N.A. pursuant to Bankruptcy Rule 7012(b) and Rule 12(b)(6) of the Federal Rules of Procedure. The reasons therefore are set forth more fully in Wells Fargo’s Amended Memorandum in Support of Motion to Dismiss Wells Fargo Bank, N.A. filed contemporaneously herewith.

Dated: June 29, 2015

WALSH, COLUCCI, LUBELEY, & WALSH, P.C.

*/s/ John E. Rinaldi*

John E. Rinaldi, VSB# 31580  
4310 Prince William Parkway, Suite 300  
Prince William, VA 22192  
Telephone: (703) 680-4664  
Facsimile: (703) 680-2161  
[jrinaldi@thelandlawyers.com](mailto:jrinaldi@thelandlawyers.com)

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on this 29<sup>th</sup> day of July 2015, I filed the foregoing by using the CM/ECF system, which will send a notice of electronic filing through the Court's electronic filing systems to counsel for the Plaintiff and all parties who have entered an appearance in this matter.

In addition, I hereby certify that the following parties that have not yet entered an appearance were served via First-Class Mail postage prepaid at the following address:

Jae Kim, Esq.  
2000 P Street, NW  
Suite 740  
Washington D.C. 20036

Chicago Title Insurance Co.  
601 Riverside Drive  
Jacksonville, FL 32204

Sharbanou Hijian  
4817 Autumn Glory Way  
Chantilly, VA 20151

Iran Zolfaghar  
4817 Autumn Glory Way  
Chantilly, VA 20151

/s/ John E. Rinaldi

P0575822.DOCX